

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND (BALTIMORE)**

JESSICA DAVIS,
Plaintiff,

CASE NO. 1:24-cv-02338-JRR

vs.

EXPERIAN INFORMATION SOLUTIONS, LLC;
TRANS UNION LLC; MIDLAND CREDIT
MANAGEMENT, LLC; and ORIONS
MANAGEMENT GROUP, LLC;
Defendants.

**DEFENDANT TRANS UNION LLC'S MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

Defendant consumer reporting agency Trans Union, LLC (“Trans Union”), submits the following Memorandum in Support of its Motion to Dismiss Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure (“Rule”) 12(b)(6) (the “Motion”).

The Motion should be granted in this *pro se* matter where Plaintiff alleges that Trans Union violated the Fair Credit Reporting Act (“FCRA”) by accurately reporting disputed tradelines with a remark indicating the accounts were in dispute because:

- A. Plaintiff fails to allege any required inaccuracy in Trans Union's reporting and case law holds that an inaccuracy must be alleged for a claim under the FCRA; and
- B. Plaintiff alleges that the accounts were disputed and Trans Union is statutorily required to report when accounts are disputed by the consumer so her claims must fail.

The reasons in support for this Motion are set forth more fully in the accompanying Memorandum.

WHEREFORE, Trans Union respectfully requests that this Court grant its Motion, dismiss Plaintiff's Complaint with prejudice in its entirety, and grant any such further relief that the Court deems necessary and proper.

Respectfully submitted,

/s/ Scott E. Brady

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Counsel for Defendant Trans Union LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **19th day of August, 2024**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

Joy Einstein, Esq. jeinstein@schulmanrogers.com	Lauren M Burnette, Esq. lburnette@messerstrickler.com
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **19th day of August, 2024**, properly addressed as follows:

Pro Se Plaintiff Jessica Davis 1046 Bayner Rd. Essex, MD 21221	
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/s/ Scott E. Brady

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